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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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JANE DOE, f/k/a KRISTY ALTHAUS,
an individual,

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Plaintiff,

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v.

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AYLO GLOBAL ENTERTAINMENT
INC., a Delaware corporation; AYLO
USA INCORPORATED, a Delaware
corporation; AYLO BILLING US
CORP., a Delaware corporation;
ETHICAL CAPITAL PARTNERS, a
foreign entity; MINDGEEK S.A.R.L., a
foreign entity; MG FREESITES, LTD.,
d/b/a “PORN HUB,” a foreign entity;
MINDGEEK USA INCORPORATED,
a Delaware corporation; 9219-1568
QUEBEC, INC., a foreign entity; and
MG BILLING US CORP., a Delaware
corporation,

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Defendants.

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CASE NO. CV 23-7488-MWF(AGRx)

**ORDER GRANTING
STIPULATION TO STRIKE
DISMISSED CLAIMS AND PARTY
AND FILE THIRD AMENDED
COMPLAINT**

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ORDER

2 Plaintiff shall file a Third Amended Complaint (“TAC”) on or before the
3 later of **October 10, 2025**, or within fourteen (14) days of this Order.

4 Plaintiff shall remove *at least* the following Paragraphs from her Second
5 Amended Complaint (“SAC”) (and renumber the TAC accordingly):

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- 7 • Paragraphs 219-241
- 8 • Paragraphs 812-829
- 9 • Paragraphs 851-909

10 In addition, Plaintiff shall strike Ethical Capital Partners as a named party
11 defendant and shall update the caption and SAC Paragraphs 120-138 accordingly.
12 Plaintiff similarly shall relocate and reframe SAC Paragraphs 353-437.

13 Plaintiff shall also review all allegations in the SAC and remove any
14 allegations, or portions thereof, on which she is no longer relying for her remaining
causes of action.

15 Defendants Aylo Global Entertainment, Inc., Aylo USA Incorporated, Aylo
16 Billing US Corp., Aylo Freesites Ltd., 9219-1568 Quebec, Inc., and Aylo Premium
17 Ltd (collectively, the “Aylo Defendants”) shall file an Answer to the TAC on or
18 before the later of **October 30, 2025**, or within twenty (20) days of filing of the
19 TAC.

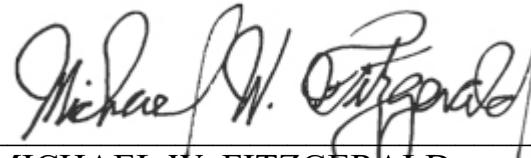
20 Following the filing of the Aylo Defendants’ Answer, Plaintiff and the Aylo
21 Defendants shall conduct a Rule 26 conference and submit a joint report.

22 Defendant Aylo Holdings S.à r.l. shall retain all rights, including, but not
23 limited to (i) the right to respond to any amended complaint that may be filed
24 following the completion of the limited jurisdictional discovery ordered by the
25 Court (ECF 142, at 8); and (ii) the right to renew its motion to dismiss pursuant to
26 Rule 12(b)(2) following completion of said jurisdictional discovery. Provided that
27 Plaintiff’s amendment of the complaint following the jurisdictional discovery
28 ordered by the Court (ECF 142, at 8) is limited to only new jurisdictional

1 allegations, Aylo Holdings S.à r.l. shall not file a Rule 12(b)(6) motion challenging
2 any amended complaint.

3 **IT IS SO ORDERED.**

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5 Dated: September 23, 2025
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MICHAEL W. FITZGERALD
United States District Judge